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JUL 20 2018

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOISTHOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTRachel Dixon Love

Plaintiff(s),

v. Chicago Public Schools  
Board of Education

Defendant(s).

**1:18-cv-4994****Judge Robert M. Dow, Jr****Magistrate Judge M. David Weisman****COMPLAINT OF EMPLOYMENT DISCRIMINATION**

1. This is an action for employment discrimination.

2. The plaintiff is Rachel Dixon Love of the  
county of Cook in the state of Illinois.3. The defendant is Chicago Public Schools Board of Education whose  
street address is 125 North Clark St.(city) Chicago (county) Cook (state) Illinois (ZIP) 60603(Defendant's telephone number) (773) 553-1000

**YEARS**

1993 - Carroll Rosenwald Elem School 2601 W. 80th, Chicago, IL 60652

2005 Faraday Elem School 3250 W. Monroe Chicago, IL 60624 Chicago

2016 Ashe Elem. School 8505 S. Ingleside Chicago, IL 60619

(county) COOK (state) Illinois (ZIP code) \_\_\_\_\_

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5. The plaintiff [*check one box*]

- (a) ☐ was denied employment by the defendant.
- (b) ☐ was hired and is still employed by the defendant.
- (c) ☒ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) September, (day) 6, (year) 2005. and September 6, 2016

7.1 (Choose paragraph 7.1 or 7.2, do not complete both.)

- (a) The defendant is not a federal governmental agency, and the plaintiff [*check one box*] ☐ has ☒ has not filed a charge or charges against the defendant

asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i) ☐ the United States Equal Employment Opportunity Commission, on or about (month) \_\_\_\_\_ (day) \_\_\_\_\_ (year) \_\_\_\_\_.
- (ii) ☐ the Illinois Department of Human Rights, on or about (month) \_\_\_\_\_ (day) \_\_\_\_\_ (year) \_\_\_\_\_.

- (b) If charges *were* filed with an agency indicated above, a copy of the charge is attached. ☐ Yes, ☒ No, **but plaintiff will file a copy of the charge within 14 days.**

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

- (a) the plaintiff previously filed a Complaint of Employment Discrimination with the

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defendant asserting the acts of discrimination indicated in this court complaint.

☐ Yes (month)\_\_\_\_\_ (day)\_\_\_\_\_ (year) \_\_\_\_\_

☐ No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month)\_\_\_\_\_  
(day) \_\_\_\_\_ (year) \_\_\_\_\_.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

☒ Yes ☐ No, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☒ Yes ☐ NO, but a copy will be filed within 14 days.

8. *(Complete paragraph 8 only if defendant is not a federal governmental agency.)*

(a) ☐ the United States Equal Employment Opportunity Commission has not  
issued a *Notice of Right to Sue*.

(b) ☐ the United States Equal Employment Opportunity Commission has issued  
a *Notice of Right to Sue*, which was received by the plaintiff on  
(month) June (day) 18 (year) 2018 a copy of which  
*Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [***check only those that apply***]:

(a) ☒ Age (Age Discrimination Employment Act).

(b) ☒ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

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- (c) ☒ Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) ☒ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☐ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☐ Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.
12. The defendant [*check only those that apply*]
- (a) ☐ failed to hire the plaintiff.
- (b) ☐ terminated the plaintiff's employment.
- (c) ☐ failed to promote the plaintiff.
- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☒ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ failed to stop harassment;
- (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) ☒ other (specify): *Does not allow the same rights/provision for plaintiff*  
*Acting principal/Teacher Maria Wall's "Supervisor Harassment, and Teacher Harassment"*

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13. Labeled my file: Rachel Dixon - Amputation of left hand.  
Refused to allow Rachel Love to get personal belongings, personal materials, supplies given from College Study (teaching posters, writing gears and Personal Art works), coat and blazer. (Escorted out). The office and ~~prems~~ <sup>School</sup> Secretary revealed personal information Teacher Maria Y
13. The facts supporting the plaintiff's claim of discrimination are as follows: Refused a door key for Rachel Love  
Refused "Preps", Lunchtime was always a meeting (Asked not eat esp)  
Refused to sign papers for medical leave (See Doctor's letter)  
Refused to issue school supplies to my student + class room  
Refused to acknowledge "TEXT Requests" and weekly reports - given in advance students  
Refused acknowledgement of my perfect attendance + class room  
Refused to allow me privacy in the washroom, Principal would send Staff person to remind/tell me to get off my cell phone/follow outside
14. [AGE DISCRIMINATION ONLY] Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.
15. The plaintiff demands that the case be tried by a jury. ☐ Yes ☐ No
16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff [check only those that apply]
- (a) ☒ Direct the defendant to hire the plaintiff.
- (b) ☒ Direct the defendant to re-employ the plaintiff.
- (c) ☐ Direct the defendant to promote the plaintiff.
- (d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e) ☒ Direct the defendant to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ Direct the defendant to (specify): holidays' payment plus contracted payments for the year with benefits

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- (g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- (h) ☒ Grant such other relief as the Court may find appropriate.

Rachel D. Love  
(Plaintiff's signature)

Rachel D. LOVE  
(Plaintiff's name)

P.O. Box 10300  
(Plaintiff's street address)

(City) Chicago (State) Ill (ZIP) 60610

(Plaintiff's telephone number) (312) 669-0656

Date: 6/19/2018

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# Letters Enclosed Employment Discrimina

Letters & Recommendations  
Skinner Magnet School (West Loop)  
Irving Elem. School (Westside/Western Ave)  
First Church of Love & Faith (Southside, 79th Street)

\* Retirement Certificate/Pictures 2010  
from Chicago Teacher Union/Dinner Banquet  
(filed for unemployment) Grand Ave. In the loop

\* Primary Doctor's letter Disabilities  
and leave for Medical Reasons October 2010

\* Letter and Forms from

EEOC  
500 Madison, floor 2000  
Chicago, ILL

# Notes from Arthur Ashe School 2016

Chief of Schools, Jeffrey Dase 773-535-81  
4655 S. Dearborn/State  
Chicago, IL

telephone 773-524-133.  
Marreal Jordan, Secu  
\* 4655 S. Dearborn St  
Chicago, IL  
collected information of Colle-  
address in city, year of car

Erica, #708-632-3454  
Janitor at Ashe Elem. School

Dr. Jackson, Assistant Principle at Ashe Elem.  
773-366-9191 cell • Threaten Security Lady of her J.

Jeffrey Dase District Evaluation (Enclosed) for Statement  
Dr. Jackson: **Does not** qualify to be Asst. or Princ

Maria Walls, and "Secretary" of Ashe School = Invasion.  
Telephone #773-266-7844 • (changed my pay due) Rachel Love  
• (forged my signature for checks) Personal Inform  
• Constantly called/Harrassmer with  
• Texts are crazy to me; Linkr  
(She wanted me to copy/use her  
lesson plans. Walls would g  
my mail from office mailbox)

Union Representative Marshall Allen • Did Nothing to help me  
said "Nothing in My Defense". • I paid union dues (Boto  
• No Returns calls, until I was out  
Ashe school/CPS system

Leadership @ ctulocal1.com = President of Teacher Union Cal  
Letter to Rachel: To personally c  
from investigate/get



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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

\_\_\_\_\_) )  
 \_\_\_\_\_) )  
 \_\_\_\_\_) )  
Rachel Dixon Love) )  
 (Name of the plaintiff or plaintiffs) ) )  
 \_\_\_\_\_) )  
 v. ) )  
 \_\_\_\_\_) )  
 \_\_\_\_\_) )  
 \_\_\_\_\_) )  
 \_\_\_\_\_) )  
 (Name of the defendant or defendants) ) )

CIVIL ACTION

NO. \_\_\_\_\_

**COMPLAINT OF EMPLOYMENT DISCRIMINATION**

1. This is an action for employment discrimination.

2. The plaintiff is Rachel Dixon Love of the  
 county of Cook in the state of Illinois.

3. The defendant is Chicago Public Schools Board of Education whose  
 street address is 125 North Clark St.  
 (city) Chicago (county) Cook (state) IL (ZIP) 60601  
 (Defendant's telephone number) (773) - 553 - 1000

4. The plaintiff sought employment, or was employed by the defendant at (street address)

YEAR → 1993 - Carroll-Rosenwald 2601 W. 80th St., Chicago, IL 60652  
2005 FARADAY Elem. School 3250 W. Monroe, Chicago, IL 60624  
2016 ASHE Elem. School 8505 S. Ingleside, Chicago, IL 60619  
 (county) COOK (state) Illinois (ZIP code) 60619 Chicago

**FILING A CIVIL CASE  
WITHOUT AN ATTORNEY:  
EMPLOYMENT DISCRIMINATION  
FORMS & INSTRUCTIONS**



**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

**(07/13/16)**